

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

DMCA SUBPOENA TO
CLOUDFLARE, INC.,

Service Provider.

Case No.:

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA TO
CLOUDFLARE, INC.

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

DECLARATION OF ANDREAS ALKIVIADES ANDREOU

I, Andreas Alkiviades Andreou, hereby declare as follows:

1. I am a Citizen of the Republic of Cyprus, over the age of 18 years old, make this declaration based upon personal knowledge and, if called to testify could and would testify competently to the facts set forth herein.

2. I am a Director of MG Premium, Ltd. (hereinafter, "MG Premium") and am authorized to act on its behalf.

3. I submit this declaration in support of MG Premium's request for issuance of a Subpoena by the Clerk of this Court, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) to Cloudflare, Inc. ("Cloudflare"), relating to the posting of MG Premium's copyrighted material on the domains, fullporner.com and xiaoshenke.net webpages hosted by Cloudflare.

4. I have personal knowledge of the copyrights owned by MG Premium and the ongoing infringements of those copyrights that occur on the internet. I also have personal knowledge of the instances that MG Premium's copyrighted works have been posted without MG Premium's authorization on fullporner.com and xiaoshenke.net.

5. On August 2, 2023, authorized agent for MG Premium Jason Tucker issued and served a copyright infringement notification on Cloudflare's DMCA Agent relating to posts on fullporner.com and xiaoshenke.net. Pursuant to Section 512(c)(3)(A), the notifications were properly signed by MG Premium's agent, identified the copyrighted material being infringed, set forth a listing of the URLs containing posts of infringing material, confirmed that such use of MG Premium's copyrighted works was not authorized by MG Premium, and gave contact information such that the DMCA Agent could reach MG Premium's Agent with questions. A true and correct copy of the August 2, 2023 notification is attached as Exhibit A.

6. The purpose of the DMCA Subpoena is to obtain information sufficient to identify alleged infringers who, without authorization from MG Premium, posted material to the

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1 web pages fullporner.com and xiaoshenke.net which infringed copyrights held by MG Premium.
2 The information received as a result of the Subpoena will only be used by MG Premium to
3 protect its rights under Title 17 of the United States Code.
4

5 I declare under penalty of perjury under the laws of the United States of America
6 that the foregoing is true and correct.
7

8 DATED this 9th day of August, 2023, at Nicosia, Cyprus.
9

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12 _____
13 Andreas Alkiviades Andreou
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Exhibit A

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**Notifications of Copyright Infringements
Issued Pursuant to
17 U.S.C. § 512(c)(3) to
Registered DMCA Agent for
Service Provider Cloudflare, Inc.**

Subject **DMCA Takedown Notice for Copyright Infringement – MG Premium Ltd.**
 From Jason Tucker [REDACTED]
 To <abuse@cloudflare.com>
 Cc [REDACTED]
 Date 2023-08-02 01:32 PM



Agent: Justin Paine
 Cloudflare
 101 Townsend Street
 Legal Department
 San Francisco, CA 94107
 Phone: 6503198930
 via Email: abuse@cloudflare.com

RE: DMCA Takedown Notice for Copyright Infringement – MG Premium Ltd.

Dear Copyright Agent,

I, Jason Tucker, hereby declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge and belief that the foregoing is true and correct and I have the authority to act on behalf of the owner of the copyrights involved.

I have a good faith belief that the use of materials identified below is not authorized by the Owner and therefore infringes on its rights pursuant to Section 512 (c) of the U.S. Copyright Law. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the content that is on your system. If you are a service provider, you may otherwise be liable for copyright infringement if, upon obtaining knowledge or awareness of infringing material being stored upon your network, you do not act expeditiously to remove, or disable access to, the material.

My contact information is as follows:

MG Premium, Ltd.
 c/o: Battleship Stance, Inc. – Jason Tucker
 Address: [REDACTED] 85016 USA
 Email: [REDACTED]

This correspondence and all of its contents is without prejudice to MG Premium Ltd. or any of their affiliated company's rights and remedies, all of which are expressly reserved.

Sincerely,

s/Jason Tucker

Jason Tucker
 Agent for MG Premium Ltd.

Links to Infringing Material:

<https://fullpornr.com/channel/brazzers>
<https://fullpornr.com/channel/realitykings>
<https://fullpornr.com/channel/mofos>
<https://fullpornr.com/watch/64ac9dde2d1dd6bf0e777110>
<https://fullpornr.com/watch/6498d7602d1dd6bf0e775243>
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